

# MacGill

Matthew Ciulla <[matthew.ciulla@macgilllaw.com](mailto:matthew.ciulla@macgilllaw.com)>

---

---

?

---

**From:** Brandon Boulware <[Brandon@boulware-law.com](mailto:Brandon@boulware-law.com)>

**Sent:** Wednesday, May 27, 2020 4:34 PM

**To:** Varon, Jay N. <[JVaron@foley.com](mailto:JVaron@foley.com)>; Matt Dameron <[matt@williamsdirks.com](mailto:matt@williamsdirks.com)>

**Cc:** MacGill, Robert <[Robert.MacGill@btlaw.com](mailto:Robert.MacGill@btlaw.com)>; Keas, Jennifer M. <[JKeas@foley.com](mailto:JKeas@foley.com)>; Fries, Brian <[brian.fries@lathropgpm.com](mailto:brian.fries@lathropgpm.com)>; Wendt, Joseph <[Joseph.Wendt@btlaw.com](mailto:Joseph.Wendt@btlaw.com)>; Levitt, Melinda F. <[MLevitt@foley.com](mailto:MLevitt@foley.com)>

**Subject:** RE: For our meet and confer discussions on Monday and Tuesday

**\*\* EXTERNAL EMAIL MESSAGE \*\***

Jay –

Sitzer Plaintiffs select the following custodians from the list that you provided for ReeceNichols and BHHS Kansas City:

- James Manning
- Robert Frazier
- Melissa Greene

Thanks.

**Brandon Boulware | Attorney**

**Boulware Law**

1600 Genessee, Suite 416

Kansas City, Missouri 64102

[brandon@boulware-law.com](mailto:brandon@boulware-law.com)

O: (816) 492-2826

C: (816) 590-1882

 Best Law Firm-2020 Resized

---

**From:** [JVaron@foley.com](mailto:JVaron@foley.com) <[JVaron@foley.com](mailto:JVaron@foley.com)>

**Sent:** Sunday, May 10, 2020 5:30 PM

**To:** Brandon Boulware <[Brandon@boulware-law.com](mailto:Brandon@boulware-law.com)>; Matt Dameron <[matt@williamsdirks.com](mailto:matt@williamsdirks.com)>

**Cc:** MacGill, Robert <[Robert.MacGill@btlaw.com](mailto:Robert.MacGill@btlaw.com)>; JKeas@foley.com; Fries, Brian <[brian.fries@lathropgpm.com](mailto:brian.fries@lathropgpm.com)>;

Wendt, Joseph <[Joseph.Wendt@btlaw.com](mailto:Joseph.Wendt@btlaw.com)>; MLevitt@foley.com

**Subject:** For our meet and confer discussions on Monday and Tuesday

Brandon/ Matt: Please see the attached letter along with a document containing some discussion of the Definitions to your Document Requests and an Employee Roster for the Missouri subsidiaries for the past five years. Believe me when I say we intended to get this to you much earlier in the day. All I can say is we did our best but apologize for the delay in getting it to you.—Jay

**Jay N. Varon**

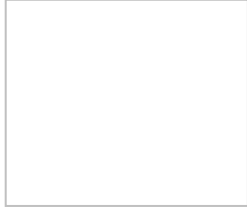
Foley & Lardner LLP

[3000 K Street, N.W. | Suite 600](#)

Washington, DC 20007-5109

P 202.672.5380

M 301.529.8468

[View My Bio](#)[Visit Foley.com](#)

The information contained in this message, including but not limited to any attachments, may be confidential or protected by the attorney-client or work-product privileges. It is not intended for transmission to, or receipt by, any unauthorized persons. If you have received this message in error, please (i) do not read it, (ii) reply to the sender that you received the message in error, and (iii) erase or destroy the message and any attachments or copies. Any disclosure, copying, distribution or reliance on the contents of this message or its attachments is strictly prohibited, and may be unlawful. Unintended transmission does not constitute waiver of the attorney-client privilege or any other privilege. Legal advice contained in the preceding message is solely for the benefit of the Foley & Lardner LLP client(s) represented by the Firm in the particular matter that is the subject of this message, and may not be relied upon by any other party. Unless expressly stated otherwise, nothing contained in this message should be construed as a digital or electronic signature, nor is it intended to reflect an intention to make an agreement by electronic means.

The information contained in this message, including but not limited to any attachments, may be confidential or protected by the attorney-client or work-product privileges. It is not intended for transmission to, or receipt by, any unauthorized persons. If you have received this message in error, please (i) do not read it, (ii) reply to the sender that you received the message in error, and (iii) erase or destroy the message and any attachments or copies. Any disclosure, copying, distribution or reliance on the contents of this message or its attachments is strictly prohibited, and may be unlawful. Unintended transmission does not constitute waiver of the attorney-client privilege or any other privilege. Legal advice contained in the preceding message is solely for the benefit of the Foley & Lardner LLP client(s) represented by the Firm in the particular matter that is the subject of this message, and may not be relied upon by any other party. Unless expressly stated otherwise, nothing contained in this message should be construed as a digital or electronic signature, nor is it intended to reflect an intention to make an agreement by electronic means.

---

### 3 attachments



**image002.png**  
22K



**image003.jpg**  
8K



image003.jpg  
8K